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8 *Attorneys for Plaintiff Rodney Hermanson*

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA  
11

12 RODNEY HERMANSON, an individual,	CASE NO. 2:19-cv-00656-RFB-GWF
13 Plaintiff,	
14 v.	STIPULATION AND [proposed]
15 CENTURY NATIONAL INSURANCE	ORDER TO EXTEND BRIEFING
16 COMPANY, a foreign insurance	DEADLINES FOR DEFENDANT'S
company, DOES 1-100, individuals; and	MOTION TO DISMISS (ECF NO.
17 ROES 1-100, companies,	18) AND ALTERNATE MOTION
	FOR MORE DEFINITE
18 Defendants.	STATEMENT (ECF NO. 19) (First
	Request)

19  
20 **IT IS HEREBY STIPULATED AND AGREED** between Plaintiff  
21 RODNEY HERMANSON and Defendant CENTURY NATIONAL INSURANCE  
22 COMPANY, by and through their undersigned counsel of record, that good cause  
23 exists for the deadline for Plaintiff to file his Responses to Defendant's Motion to  
24 Dismiss (ECF No. 18) and Alternate Motion for More Definite Statement (ECF  
25 No. 19) be extended from May 30, 2019, until **June 6, 2019**. Defendant filed its  
26 motions on May 16, 2019.

27 Good cause exists for this extension as Plaintiff's counsel has been involved  
28 in extensive negotiations and drafting of a joint pretrial order in a complex

1 consolidated wrongful death action, entitled *Wesco Ins. Co. et al. v. Smart Indus.*  
2 *Corp. et al.*, Case No. 2:16-cv-01206-JCM-GWF, consolidated with Case No. 2:16-  
3 cv-02378-RFB-GWF. Additionally, Plaintiff's counsel has had limited time to  
4 devote to these motions as a result of Memorial Day and pre-scheduled out-of-  
5 state travel starting May 29, 2019. Given the dispositive nature of Defendant's  
6 motion, Plaintiff's counsel respectfully requests additional time to prepare  
7 responsive briefs. In light of the same and pending the Court's approval,  
8 Defendant's counsel has graciously agreed to a one-week extension, through and  
9 until June 6, 2019.

10 This is the first extension requested in connection with the underlying  
11 motions, and is presented in good faith and not for purposes of delay. The Parties  
12 therefore respectfully request that this Court approve the foregoing stipulation.

13 DATED this 28th day of May 2019.

DATED this 28th day of May 2019.

14 **HALL JAFFE & CLAYTON, LLP**

**BAUMAN LOEWE WITT & MAXWELL**

15 /s/ Michael R. Hall

/s/ Michael C. Mills

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*Attorney for Defendant*

*Century National Insurance Company*

22 **ORDER**

23 **IT IS SO ORDERED.**

24 DATED this 29th day of May, 2019.

25   
26 RICHARD F. BOULWARE, II  
27 UNITED STATES DISTRICT JUDGE  
28